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10 **BEFORE THE**
BOARD OF REGISTERED NURSING
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 2008-311

13 **NANCY J. CAUSEY, AKA**
14 **NANCY JEAN CAUSEY**
7448 Santa Susana Way
15 Fair Oaks, CA 95628
and
16 5080 Chiricahua Trail
Las Cruces, NM 88012

A C C U S A T I O N

17 Registered Nurse License No. 544269

18 Respondent.
19

20 Complainant alleges:

21 **PARTIES**

22 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation
23 solely in her official capacity as the Executive Officer of the Board of Registered Nursing
24 ("Board"), Department of Consumer Affairs.

25 2. On or about June 22, 1998, the Board issued Registered Nurse License
26 Number 544269 to Nancy J. Causey, also known as Nancy Jean Causey ("Respondent"). The
27 registered nurse license expired on January 31, 2008.

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4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

6. Code section 2762 states, in pertinent part:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or administer to another, any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as defined in Section 4022.

(b) Use any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to himself or herself, any other person, or the public or to the extent that such use impairs his or her ability to conduct with safety to the public the practice authorized by his or her license.

(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any hospital, patient, or other record pertaining to the substances described in subdivision (a) of this section.

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1 a. Respondent obtained hydromorphone, a controlled substance, by fraud,
2 deceit, misrepresentation, or subterfuge, or the concealment of a material fact, in violation of
3 Health and Safety Code section 11173, subdivision (a), by taking the drug from hospital supplies
4 for her own personal use.

5 b. Respondent possessed hydromorphone, a controlled substance, in violation
6 of Code section 4060.

7 c. Respondent self-administered hydromorphone, a controlled substance,
8 without direction from a licensed physician, surgeon, dentist or podiatrist.

9 **SECOND CAUSE FOR DISCIPLINE**

10 (False, Grossly Inconsistent or Unintelligible Entries in Hospital or Patient Records)

11 12. Respondent's registered nurse license is subject to disciplinary action
12 under Code section 2761, subdivision (a), on the grounds of unprofessional conduct, as defined
13 in Code section 2762, subdivision (e), in that while on duty as a registered nurse at Sutter
14 Hospital Roseville in Roseville, California, Respondent falsified or made grossly incorrect,
15 grossly inconsistent or unintelligible entries in hospital and patient records, as follows:

16 **Patient #1**

17 a. On or about June 1, 2002, at 1542 hours, Respondent withdrew 2 mg of
18 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
19 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
20 or otherwise account for the disposition of the drug.

21 b. On or about June 1, 2002, at 1857 hours, Respondent withdrew 2 mg of
22 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
23 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
24 or otherwise account for the disposition of the drug.

25 c. On or about June 2, 2002, at 1820 hours, Respondent withdrew 2 mg of
26 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
27 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
28 or otherwise account for the disposition of the drug.

1 d. On or about June 3, 2002, at 1557 hours, Respondent withdrew 2 mg of
2 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
3 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
4 or otherwise account for the disposition of the drug.

5 e. On or about June 3, 2002, at 1710 hours, Respondent withdrew 2 mg of
6 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
7 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
8 or otherwise account for the disposition of the drug.

9 f. On or about June 3, 2002, at 1914 hours, Respondent withdrew 2 mg of
10 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
11 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
12 or otherwise account for the disposition of the drug.

13 g. On or about June 3, 2002, at 2248 hours, Respondent withdrew 2 mg of
14 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
15 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
16 or otherwise account for the disposition of the drug.

17 h. On or about June 3, 2002, at 2250 hours, Respondent withdrew 2 mg of
18 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
19 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
20 or otherwise account for the disposition of the drug.

21 **Patient #2**

22 i. On or about June 1, 2002, at 2004 hours, Respondent withdrew 2 mg of
23 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
24 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
25 or otherwise account for the disposition of the drug.

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1 j. On or about June 2, 2002, at 1601 hours, Respondent withdrew 2 mg of
2 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
3 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
4 or otherwise account for the disposition of the drug.

5 k. On or about June 2, 2002, at 1948 hours, Respondent withdrew 2 mg of
6 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
7 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
8 or otherwise account for the disposition of the drug.

9 l. On or about June 2, 2002, at 2235 hours, Respondent withdrew 2 mg of
10 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
11 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
12 or otherwise account for the disposition of the drug.

13 **Patient #3**

14 m. On or about June 11, 2002, at 1532 hours, Respondent withdrew 1 mg of
15 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
16 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
17 or otherwise account for the disposition of the drug.

18 n. On or about June 11, 2002, at 1709 hours, Respondent withdrew 1 mg of
19 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
20 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
21 or otherwise account for the disposition of the drug.

22 o. On or about June 11, 2002, at 1711 hours, Respondent withdrew 1 mg of
23 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
24 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
25 or otherwise account for the disposition of the drug.

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1 p. On or about June 12, 2002, at 1540 hours, 4 seconds, Respondent
2 withdrew 1 mg of Hydromorphone from the Pyxis medication dispenser for this patient, yet
3 failed to chart the administration or wastage of any portion of the Hydromorphone in any patient
4 or hospital record or otherwise account for the disposition of the drug.

5 q. On or about June 12, 2002, at 1540 hours, 37 seconds, Respondent
6 withdrew 1 mg of Hydromorphone from the Pyxis medication dispenser for this patient, yet
7 failed to chart the administration or wastage of any portion of the Hydromorphone in any patient
8 or hospital record or otherwise account for the disposition of the drug

9 r. On or about June 12, 2002, at 1749 hours, Respondent withdrew 1 mg of
10 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
11 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
12 or otherwise account for the disposition of the drug.

13 s. On or about June 12, 2002, at 1937 hours, Respondent withdrew 1 mg of
14 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
15 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
16 or otherwise account for the disposition of the drug.

17 **Patient #4**

18 t. On or about June 11, 2002, at 1857 hours, Respondent withdrew 2 mg of
19 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
20 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
21 or otherwise account for the disposition of the drug.

22 u. On or about June 11, 2002, at 2304 hours, Respondent withdrew 2 mg of
23 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
24 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
25 or otherwise account for the disposition of the drug.

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1 v. On or about June 12, 2002, at 1522 hours, Respondent withdrew 2 mg of
2 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
3 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
4 or otherwise account for the disposition of the drug.

5 w. On or about June 12, 2002, at 1937 hours, Respondent withdrew 2 mg of
6 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
7 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
8 or otherwise account for the disposition of the drug.

9 **Patient #5**

10 x. On or about June 15, 2002, at 1613 hours, Respondent withdrew 2 mg of
11 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
12 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
13 or otherwise account for the disposition of the drug.

14 y. On or about June 15, 2002, at 1619 hours, Respondent withdrew 2 mg of
15 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
16 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
17 or otherwise account for the disposition of the drug.

18 z. On or about June 15, 2002, at 2136 hours, Respondent withdrew 2 mg of
19 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
20 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
21 or otherwise account for the disposition of the drug.

22 aa. On or about June 17, 2002, at 1532 hours, Respondent withdrew 2 mg of
23 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
24 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
25 or otherwise account for the disposition of the drug.

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1 bb. On or about June 17, 2002, at 1601 hours, Respondent withdrew 2 mg of
2 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
3 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
4 or otherwise account for the disposition of the drug.

5 cc. On or about June 17, 2002, at 1844 hours, Respondent withdrew 2 mg of
6 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
7 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
8 or otherwise account for the disposition of the drug.

9 **Patient #6**

10 dd. On or about June 16, 2002, at 1635 hours, Respondent withdrew 2 mg of
11 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
12 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
13 or otherwise account for the disposition of the drug.

14 ee. On or about June 16, 2002, at 1900 hours, Respondent withdrew 2 mg of
15 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
16 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
17 or otherwise account for the disposition of the drug.

18 ff. On or about June 16, 2002, at 2122 hours, Respondent withdrew 2 mg of
19 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
20 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
21 or otherwise account for the disposition of the drug.

22 **Patient #7**

23 gg. On or about June 17, 2002, at 2018 hours, Respondent withdrew 4 mg of
24 Hydromorphone from the Pyxis medication dispenser when there was no physician's order for
25 Hydromorphone for this patient. Respondent failed to chart the administration or wastage of any
26 portion of the Hydromorphone in any patient or hospital record or otherwise account for the
27 disposition of the drug.

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1 hh. On or about June 17, 2002, at 2250 hours, Respondent withdrew 4 mg of
2 Hydromorphone from the Pyxis medication dispenser when there was no physician's order for
3 Hydromorphone for this patient. Respondent failed to chart the administration or wastage of any
4 portion of the Hydromorphone in any patient or hospital record or otherwise account for the
5 disposition of the drug.

6 **Patient #8**

7 ii. On or about June 20, 2002, at 1616 hours, Respondent withdrew 1 mg of
8 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
9 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
10 or otherwise account for the disposition of the drug.

11 jj. On or about June 20, 2002, at 2103 hours, Respondent withdrew 1 mg of
12 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
13 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
14 or otherwise account for the disposition of the drug.

15 kk. On or about June 21, 2002, at 1721 hours, Respondent withdrew 1 mg of
16 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
17 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
18 or otherwise account for the disposition of the drug.

19 ll. On or about June 22, 2002, at 1942 hours, Respondent withdrew 1 mg of
20 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
21 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
22 or otherwise account for the disposition of the drug.

23 **Patient #9**

24 mm. On or about June 21, 2002, at 1546 hours, Respondent withdrew 1 mg of
25 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
26 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
27 or otherwise account for the disposition of the drug.

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1 nn. On or about June 21, 2002, at 2137 hours, Respondent withdrew 1 mg of
2 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
3 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
4 or otherwise account for the disposition of the drug.

5 **Patient #10**

6 oo. On or about July 9, 2002, at 1532 hours, Respondent withdrew 2 mg of
7 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
8 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
9 or otherwise account for the disposition of the drug.

10 pp. On or about July 9, 2002, at 1904 hours, Respondent withdrew 2 mg of
11 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
12 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
13 or otherwise account for the disposition of the drug.

14 qq. On or about July 9, 2002, at 2116 hours, Respondent withdrew 2 mg of
15 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
16 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
17 or otherwise account for the disposition of the drug.

18 rr. On or about July 9, 2002, at 2259 hours, Respondent withdrew 2 mg of
19 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
20 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
21 or otherwise account for the disposition of the drug.

22 ss. On or about July 10, 2002, at 1527 hours, Respondent withdrew 2 mg of
23 Hydromorphone from the Pyxis medication dispenser for this patient, yet failed to chart the
24 administration or wastage of any portion of the Hydromorphone in any patient or hospital record
25 or otherwise account for the disposition of the drug.

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1 **PRAYER**

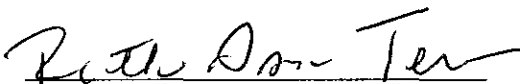
2 **WHEREFORE**, Complainant requests that a hearing be held on the matters
3 herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending registered nurse license Number 544269, issued
5 to Nancy J. Causey, also known as Nancy Jean Causey;

6 2. Ordering Nancy J. Causey, also known as Nancy Jean Causey, to pay the
7 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this
8 case, pursuant to Code section 125.3; and,

9 3. Taking such other and further action as deemed necessary and proper.

10 DATED: 5/11/08

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12 
13 RUTH ANN TERRY, M.P.H., R.N.
14 Executive Officer
15 Board of Registered Nursing
16 Department of Consumer Affairs
17 State of California
18 Complainant

16 03579110-SA2008100251
17 Causey.Acc.wpd
18 baf [4/4/08]
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